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MEMORANDUM ENDORSED

VIA ECF

The Honorable Gergory H. Woods Southern District of New York United States Courthouse 500 Pearl Street, Room 2260 New York, NY 10007

Re: Royce Corporation
V.
MAERSK A/S,
25-cv-02848(GHW)(GS)

Dear Judge Woods:

Counsel jointly write today to provide a status report with respect to the captioned litigation. Counsel have discussed the claims set out in plaintiff's complaint. Those discussions have narrowed the issues, which if resolved are likely to lead to a negotiated settlement of the matter.

Those 2 issues are: The applicable law and whether defendant can enforce a London jurisdiction clause in the bill of lading, as well as the applicable package limitation.

In an attempt to limit legal fees for both parties, Plaintiff's counsel has agreed to provide an informal production of initial claim documents as well as an assessment of their legal arguments with respect to the jurisdiction/forum

selection clause issue before engaging in formal discovery as envisioned in the Proposed Case Management Plan filed with the Court today. In the event that the parties are unable to come to an early resolution of the matter, Defendant contemplates moving for summary judgment on the jurisdiction/forum selection defense, and, alternatively, for partial summary judgment on the package limitation defense.

Because we do not anticipate to be able to fully address the issues pointed to above by the July 25, 2025 pre-trial conference counsel request that the date for the initial pre-trial conference be rescheduled the week of August 18th to a day and time convenient to the Court. (For scheduling purposes, please note that counsel for Defendant has a settlement conference scheduled for August 20, 202).

We thank the Court for its consideration of the within request.

Respectfully submitted.

John F. Ryan Counselor at Law

Freehill Hogan & Mahar LLP

By:/s/John F. Ryan

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Application denied. The parties will have an opportunity to propose a schedule for disposition of this matter during the initial pretrial conference scheduled for July 25, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 15.

SO ORDERED.

Dated: July 20, 2025

GREGORYH. WOODS
United States District Judge

PAGE 2